CHAPTER 9: TRAINING PROGRAM MANAGEMENT AND ADMINISTRATION

Training Records Administration Policy

A hard copy file folder will be kept for each employee. The contents will include, but are not limited to, training records for all agency required courses, evaluations from assignments, Position Task Book verification; yearly updated IQCS forms, and Responder Master Record (RPTC028) from IQCS.

Training Records File

An efficient way for the Training Officer to organize records is in a six- or eight-way file folder. The file contents should include, but are not limited to:

- Employee Work Capacity Test (WCT) Record, signed and dated by the test administrator
- Copy of the employee's current Incident Qualification Card (Red Card)
- Fire and training experience sheets
- Copies of training certificates
- Copies of Position Task Book covers when issued
- Copies of Position Task Book cover, signature page, and experience blocks when signed off
- Documentation that supports decisions made on qualifications
- Performance rating sheets from fires
- Current copies of updated Incident Qualification and Certification System (IQCS) forms and data sheets (Responder Master Record—RPTC028) when experience and training has been entered into the IQCS database

Each Training Officer is encouraged to develop a system for collecting and filing training information. A suggested method is:

- Create two folders—one labeled "Training Records—Data Entry" and another labeled "Training Records—To be Filed"
- Collect original training documentation from each employee, make a copy, and place in the "Training Records—Data Entry" folder. Return the original certificates, etc., to the employee for safe keeping.
- Perform data entry, initial and date the copied documents and file them directly in each employee's training records file or place them in the "Training Records—To be Filed" folder for filing at a later time.

Training Records File Storage/Retention

All records will be stored and/or destroyed in accordance with agency policy (e.g., securing files in a locking filing cabinet to protect personal information). These policies can be found at http://www.blm.gov/nhp/records/blmgrs/toc.html. The Training Officer needs to read and be familiar with Schedule 1, item 29 and Schedule 23, item 1 a.

Employees who transfer to another unit/agency or separate from service need to be given a copy of their training records file; however, the local unit must maintain a file on these individuals for a period of five years after the employee leaves.

Employee Responsibility

Training Officers should inform employees that the employee is responsible for maintaining original training certificates, completed Position Task Books, experience records, and any other qualifications records that may be needed to support training and qualifications.

Individual Qualification Review

One of the Training Officer's responsibilities is to ensure that employees have the proper documentation in their training records file that supports the position(s) on each employee's Red Card. It is suggested that a review be performed initially for all new employees and periodically for all other employees.

The Review Process

Each Training Officer is welcome to develop his/her individual qualification review process. A sample review process is provided below:

Beginning with the lowest-ranking position, work up to the highest. A sample Individual Qualification Review Documentation Form and Qualification Review Date Tracking sheet are available on the BLM Fire and Aviation Training Information Job Aid Web site under the *Training Tools* section at http://www.fire.blm.gov/training/blmtrng/JobAid/tools.html.

Official Individual Qualification Review Folder

- Create an official qualification review folder for each employee which includes:
 - Qualification Review Date Tracking Sheet
 - Individual Qualification Review Documentation Form

Individual Qualification Review Documentation Form

- Identify the position being reviewed.
- Identify the year the employee became qualified for the position.
- Review the supporting document(s), such as the PMS-310, that contain the training requirements for the time period the employee became qualified.
 - Locate the position within the supporting document(s).
 - Identify the required and additional training needed for the position.
- Did the employee complete the training for the position?
 - Identify the date(s) the employee attended the training related to the position.
 - Does the employee have the completion certificates for the required courses?
 - Document any missing paperwork on the review documentation form.
- Did the position require a Position Task Book?
 - Is there a copy of the Position Task Book in the folder?
 - Cover page?
 - Signature page?
 - Experience pages?
- Notify the employee of missing documentation and have them provide them for inclusion in the training records folder.
- File copies of the submitted documentation in the employee's training records folder and update the review documentation form.
- Repeat the review process for each position the employee has become qualified.

FMO/Training Officer Review and Individual Counseling

- Review the employee's qualification review folder with the FMO who will have the final decision on whether the employee keeps the qualification or reverts back to training status. This may require that the employee complete additional requirements and a task book for the position.
- Counsel (typically done by the FMO) the employee to develop a plan of action.

Qualification Review Documentation

- Make a copy of all documents and file in the employee's qualification review folder.
- Give all original documentation and comments from the FMO and Training Officer to the employee for his/her records.

The Incident Qualification Card (Red Card)

The Agency Administrator (or delegate; e.g., Training Officer) is responsible for annual certification of personnel working in wildland and prescribed fire positions. Agency certification is issued annually in the form of an Incident Qualification Card (Red Card) which certifies that the individual is qualified to perform in a specified position. The Red Card must be reviewed for

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accuracy and signed by the Agency Administrator or delegated official. The Agency Administrator, fire manager, and individual are responsible for monitoring medical status, fitness, training, and performance, and for taking appropriate action to ensure the employee meets all position performance requirements. Training, medical screening, and successful completion of the appropriate work capacity test (WCT) must be properly accomplished per agency policy.

All Red Cards issued to BLM employees, with the exception of EFF or temporary employees at the FFT2 level, will be printed using the IQCS application. Red Cards issued to EFF or temporary employees at the FFT2 level may be printed at the local level without the use of the IQCS application.

The BLM will designate employees at the national, regional/state, and local levels as Fire Qualifications Administrators. The administrators ensure all incident experience, incident training, and Position Task Books for employees within the BLM are accurately recorded in the IQCS application. All records must be updated annually or modified as changes occur.

Red Card certification will have a 12-month currency from the date issued.

Incident Qualification Card (Red Card) Review Committees (IQCRC)

Each unit with fire management responsibilities will establish an Incident Qualification Card Review Committee (IQCRC) that will develop a qualification and certification process and provide management oversight and review of the wildland and prescribed fire positions under their jurisdiction. The committee will:

- Ensure that fire and prescribed fire qualifications generated by IQCS for employees are valid by reviewing the training and experience of each employee.
- Review Incident Qualification Cards to ensure that employees are meeting the requirements of the BLM.
- Evaluate if each employee possesses the personal characteristics necessary to perform the wildland and prescribed fire positions in a safe and efficient manner.
- Make recommendations to the appropriate agency administrator or designee who is responsible for final certification signature in Position Task Books.
- Provide oversight and sponsor wildland and prescribed fire training to ensure a pool of qualified personnel are maintained within the area.
- Ensure training nominees meet minimum requirements for attending courses.

The composition of the IQCRC should be:

- Agency Administrator or Delegate
- FMO or Delegate

- Non-Fire Agency Representatives: from the BLM, with a minimum qualification of Unit Leader or Single Resource Boss
- Training Officer
- Fuels Group Representative
- Aviation Unit Representative
- Fire Operations Specialist (FOS) Level Representative

Small units with less staff may only have a few of the above positions on the committee. When areas cooperate with other federal, state, or local agencies, an interagency committee should include representatives from each unit.

IQCS does not separate prescribed fire qualifications by fuel group. The local IQCRC is responsible for ensuring that Prescribed Fire Burn Boss (RXB1 and RXB2) qualifications and training are appropriate for the fuel group(s) where the employee will be working.

A key concept of the Wildland Fire Qualifications System is that it is performance-based (i.e., based on demonstrated individual skills, rather than based on requisite training). An individual may become qualified for a position through a combination of experience and education (training). The system allows for subjective evaluation by qualified evaluators of an individual's job performance competency. The local IQCRC may override and withhold job certification if the employee has demonstrated inadequate performance or otherwise does not meet standards (fitness, medical, etc.).

Procedures for Requesting, Authorizing, and Documenting Employee Training

When BLM employees are requesting training outside of NWCG courses a *Standard Form-182*, "*Request, Authorization, Agreement, and Certification of Training* (SF-182) shall be used to request, authorize, and document training in government and non-government facilities. This form was designed to serve several purposes, including nomination and approval of training, purchase order/requisition, registration/acceptance, continued service agreement, billing document, training evaluation, certification of completed training, and input document to the Central Personnel Data File.

In general terms, the typical flow of information and documentation for requesting vendor training services and for working the SF-182 through the system is as follows:

- 1. The employee submits a request for training to their supervisor.
- 2. The supervisor either approves or disapproves of the training. If the request is approved, the supervisor (or delegate; e.g., Training Officer) will prepare and forward a written training request to Human Resources (HR) at their unit.

- recognized that exceptions may occur where courses are of such a technical nature that no one person may be technically competent to instruct all units.
- Unit instructors must be experienced in the lesson content they are presenting.
- Adjunct instructors may be utilized to provide limited instruction in specialized knowledge and skills at the discretion of the lead instructor. They must be experienced, proficient, and knowledgeable of current issues in their field of expertise.

Training Requirements for Instructors

100 Level Courses

No instructor training required; may be taught by anyone possessing the knowledge and skills with local approval.

200 Level Courses

Unit instructors should have 32 hours of instructor training (Facilitative Instructor, M-410, or equivalent course).

Lead instructors are required to have 32 hours of instructor training (Facilitative Instructor, M-410, or equivalent course).

300 and Above Level Courses

All instructors are required to have 32 hours of instructor training (Facilitative Instructor, M-410, or equivalent course).

Nomination Process for an NWCG Course

A BLM employee who is applying for an NWCG course needs to start the process by filling out a NWCG Training Nomination form. Blank forms can be found at www.nationalfiretraining.net. The employee needs to know that his/her selection is dependent upon a correctly completed form.

The Unit/Zone Training Officer and the employee need to verify that all agency course and NWCG prerequisites have been met. They also will need to make sure that all the necessary signatures have been obtained and are on the form.

The Unit/Zone Training Officer will mail nomination forms through the appropriate channels prior to the course nomination date. In general terms, the appropriate channels are as follows:

• Completed NWCG nomination forms for all within-area and out-of-area 100-200 level courses must be submitted to the Unit/Zone Training Committee for

- approval; once approved the form will then need to be submitted to the Course Coordinator for acceptance.
- Completed NWCG nomination form for within-area 300-600 level courses must be submitted to the Unit/Zone Training Committee for approval. During this approval process the nominee will be given a prioritized number; once approved, the form will then be submitted to the area Geographic Area Training Representative (GATR) for prioritization and approval. Once approved, the nomination form is submitted to the Course Coordinator who will then place the nominee into a course or place the nominee on a wait list. The nominee will be notified of their status by the Course Coordinator.
- Completed NWCG nomination forms for out-of-area 300-600 level, NARFI, and other miscellaneous courses must be submitted to Unit/Zone Training Committee for approval. During this approval process the nominee will be given a prioritized number; once approved the form will then be submitted to the area GATR who will submit it to the host area GATR for prioritization and approval. Once approved, the nomination form is submitted to the Course Coordinator who then places the nominee into the course or places the nominee on a wait list. The nominee will be notified of their status by the Course Coordinator.

When the nomination flow process in IQCS is completed, nominations will be processed electronically through that system. Completion date for this portion of the IQCS is unknown at this time.

Equivalency Determination for Fire Training Courses

Equivalent fire training courses must meet two criteria:

- Evaluators have determined that the courses are equivalent to courses identified in the National Wildfire Coordinating Group (NWCG) approved curriculum.
- The Office of Fire and Aviation's (OF&A) Bureau of Land Management (BLM) Training Unit Leader at the National Interagency Fire Center (NIFC) has approved the courses as equivalent.

Process to Evaluate and Establish Equivalent Courses

1. The appropriate state office (SO) fire management staff or national committee identifies the need for an equivalency analysis of a specific course. The SO fire management staff or national committee can assemble an evaluation team (see **Evaluation Team Composition**) to conduct the analysis, document their findings, and submit recommendations through agency channels to the OF&A's BLM Training Unit Leader for an equivalency review. If assistance is needed in assembling the appropriate evaluation team or conducting the evaluation, it can be requested from the BLM Training Unit Leader.

- 2. If the BLM Training Unit Leader determines that the equivalent course analysis is sufficient and the proposed course meets the NWCG certified course standards, the Director, OF&A shall issue a memorandum stating that the course is equivalent.
- 3. The BLM IQCS Lead will issue a course number for the equivalent course and enter it into IQCS with a competency for the NWCG course. The Lead will provide the information to the Federal Fire Training Task Group for interagency collaboration on equivalent courses.
- 4. The BLM Training Unit Leader may also provide the equivalency information to the NWCG Training Working Team and the Geographic Area Training Representatives (GATRs), other agencies and/or the states for information-sharing purposes.
- 5. If the BLM Training Unit Leader determines that the equivalent course analysis is not sufficient or that it does not support a recommendation to designate the course equivalent, the Director, OF&A shall issue a memorandum stating this to the SO fire management staff or national committee that initiated the evaluation process.

Analyses conducted by other agencies may also be used in making course equivalency determinations.

Evaluation Team Composition

The evaluation team shall be comprised of a minimum of three of the following members: lead instructor, cadre member, and course developer or subject matter expert for the respective NWCG course. The evaluators shall be individuals who have either been involved within the past three years in instructing the course that is being evaluated, or who are familiar with the course development and revision process.

Evaluation Methodology

The evaluation team shall consider, at a minimum, the following items when attempting to determine whether a course is equivalent to an NWCG course or not:

- Comparison of course objectives. The learning objectives of the two courses must be thoroughly analyzed and found to be substantially similar, both at the unit level and at the course level.
- Comparison of course content. There should be no omissions of major topics, procedures or concepts that are contained in the NWCG course.
- Testing. Tests administered to trainees to measure content learned must be similar in terms of information tested, length of test, and percentage required for a passing grade.
- Documentation of findings. The evaluation team shall document its analysis and findings and forward them to the BLM Training Unit at NIFC with its recommendation.

It is acceptable for an equivalent course to have more in-depth subject matter content than an NWCG course; it is not acceptable for it to have less.

Equivalent Courses

The OF&A has previously determined that the courses listed below in the table are equivalent to the identified NWCG course. Persons who have successfully completed the identified equivalent course do not need to attend the corresponding NWCG course, and should receive credit for it in the Incident Qualifications and Certification System.

NWCG Approved Curriculum	Approved Equivalent Course(s)		
Facilitative Instructor (M-410)	National Fire Protection Association, Fire Service Instructor I (NFPA 1041) State of Idaho Basic Instructional Skills (G-265)		
Introduction to Fire Effects (RX-310)	Successful completion of Technical Fire Management.		
Human Factors on the Fireline (L-180)	Firefighter Training (S-130, 2004 version). The 2004 version of S-130 incorporates L-180 into the course package.		
Engine Operator (PMS 419)	Driving for the Fire Service (S-216)		